

Amdt. dated August 16, 2005  
Reply to Office action of May 16, 2005 and  
Advisory Action of August 11, 2005

Serial No. 09/809,759  
Docket No. ROC920000170US1  
Firm No. 0021.0013

### REMARKS/ARGUMENTS

Claims 1-54 are in the case. The applicants have studied the office action dated May 16, 2005 and the Advisory Action dated August 11, 2005 and believe the application is in condition for allowance. Reconsideration and reexamination are respectfully requested.

In the present claim listing, claims 1, 13, 19, 31, 37, and 49 have been amended. It is respectfully submitted that these amendments will not require a new search or raise new issues for consideration by the Examiner. For example, claim 1 has been amended to recite "receiving user selection of a provided substitute network address" and to amend the remaining portion to conform to the added antecedent. It is noted that original claim 13 recited similar language: "receiving user selection of one of the network addresses on the list to substitute for the network address in the file addressing content that did not satisfy the qualifying threshold ." Claim 13 has been amended to conform to the added antecedent of claim 1. Independent claims 19 and 37 and their dependent claims 31 and 49, respectively, have been amended in an analogous fashion. It is therefore respectfully submitted that these amendments will not require a new search or raise new issues for consideration by the Examiner. It is further submitted that these amendments place the claims in better form for appeal. These amendments were not presented earlier because they were deemed appropriate to advance prosecution after receipt of the latest Office Action. The Examiner is therefore respectfully requested to enter and consider these amendments after the final rejection.

Claims 1-54 have been rejected under 35 U.S.C. Sec. 103(b) as being unpatentable over Montalbano, U.S. Pat. No. 5,918,237 in view of Anupam et al, U.S. Pat. No. 6535912. This rejection is respectfully traversed.

Claim 1, for example, is directed to a "computer implemented method for verifying a network address, comprising: *inter alia*, accessing a network address included within a file; ... providing a substitute network address if the accessed content did not satisfy the qualifying threshold ; receiving user selection of a provided substitute network

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address; and in response to said user selection, substituting within the file the user selected substitute network address for the accessed network address." It is noted that the Examiner has clearly failed to cite any teaching or suggestion, in either the Montalbano reference, or the Anupam reference, considered either alone, or in combination, of the recited "receiving user selection of a provided substitute network address; and in response to said user selection, substituting within the file the user selected substitute network address for the accessed network address" as required by claim 1. It is therefore respectfully submitted that the rejection of the claims should be withdrawn.

Moreover, the Examiner concedes that the Montalbano reference "does not specifically teach providing a substitute address if a threshold is not satisfied, and substituting accordingly." It appears to be the Examiner's position that this deficiency of the Montalbano reference is met by the Examiner's citations to the Anupam reference. More specifically the Examiner has cited the Anupam reference as teaching "heuristics for finding the best alternative match of a URL to be substituted accordingly ...". However, the Examiner's citations to the Anupam reference make clear that either the heuristics find a match or the playback is aborted. The Examiner has failed to cite any role of a user in the operations of the Montalbano or Anupam devices, which includes "receiving user selection of a provided substitute network address; and in response to said user selection, substituting within the file the user selected substitute network address for the accessed network address" as required by claim 1.

It is noted that the Examiner has cited one role of a user in the operation of the Montalbano device, that is, a user is provided the opportunity to "Click here to find out more." The Examiner has cited no portion of the Montalbano or Anupam references which teaches or suggests that a user clicking on a video to learn more about a product will in any manner cause "substituting within the file the user selected substitute network address for the accessed network address" as required by claim 1. Indeed, if the user does click on the video, presumably the correct network address was accessed and there would be no motivation to substitute a different address. Conversely, if the user fails to click on the video, there could be no substituting "receiving user selection of a provided

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substitute network address.” Accordingly, the Examiner has clearly failed to cite any proper motivation to combine the Montalbano and Anupam references.

It is further noted that the Examiner has cited one role of a user in the operation of the Anupam device, that is, a user is provided the opportunity to “provide an input between each or selected pages before a next page is retrieved.” This user input appears to be either a “proceed”, “pause” or “resume” playback command. The Examiner has cited no portion of the Montalbano or Anupam references which teaches or suggests “receiving user selection of a provided substitute network address” nor “substituting within the file the user selected substitute network address for the accessed network address” as required by claim 1. Instead, it appears that the device of the Anupam reference accesses a network address, or a substitute network address or aborts, independently of any user input, once playback is initiated. Thus, even if the references were combined in the manner suggested by the Examiner, a position disputed by the applicants, such a combination would clearly fail to provide the recited “receiving user selection of a provided substitute network address; and in response to said user selection, substituting within the file the user selected substitute network address for the accessed network address” as required by claim 1.

Independent claims 19 and 37 may be distinguished in a similar manner.

The rejection of the dependent claims is improper for the reasons given above. Furthermore, the dependent claims include additional limitations, which in combination with the base and intervening claims from which they depend provide still further grounds of patentability over the cited art.

The Examiner has made various comments concerning the obviousness of certain features of the present inventions. Applicants respectfully disagree. Applicants have addressed those comments directly hereinabove or the Examiner’s comments are deemed moot in view of the above response.

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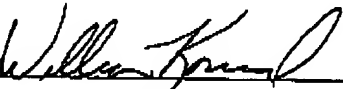
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Conclusion

For all the above reasons, Applicants submit that the pending claims 1-54 are patentable over the art of record. Applicants have not added any claims. Nonetheless, should any additional fees be required, please charge Deposit Account No. 50-0585.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

Dated: July 14, 2005

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